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VIA ECF
The Hon. Judge John G. Koeltl
U.S. District Judge, Southern District of New York (Foley Square)
40 Foley Square New York
Manhattan, New York, NY 10007

Application granted
So ordered.
6/20/24 [signature] U.S.D.J.

June 20, 2024

Dear Honorable Judge Koeltl:

RE: *Erica Cardenas v. IMS Fund LLC*, Civil Action No. 1:24-cv-04041-JGK
Pre-Motion Conference Request Pursuant to Individual Rule II(B)

Dear Honorable Judge Koeltl:

Defendant has sent an email to chambers attached hereto. As set forth therein, Defendant would like to bring to your immediate attention as follows:

Exhibit A annexed to Defendant's Letter Motion for Conference, DE #9, was inadvertently uploaded with the non-redacted version as opposed to the redacted version (redacting the Social Security Numbers and Date of Births). Even though the information was obtained from Tracers Public Records, out of an abundance of caution, Defendant respectfully requests that Exhibit A be temporarily sealed and made inaccessible to PACER users.

Pursuant to Rule 21.7 of the Electronic Case Filing Rules & Instructions, upon discovering the inadvertent error, on June 20, 2024[1], Defendant sent an email to Chambers, and copied to helpdesk@nysd.uscourts.gov requesting that Exhibit A be temporarily sealed and made inaccessible to PACER users. (*See* attached)

Likewise, pursuant to Rule 21.7 Defendant respectfully requests the Court formally seal Exhibit A to DE #9; and pursuant to Rule 21.7(c), Defendant is filing herewith the substitute redacted version of Exhibit A, which Defendant requests be substituted for the current unredacted Exhibit A to DE#9.

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[1]   The Court was closed on June 19th, 2024 for a national holiday.

Respectfully submitted,

Jeffrey M. Rosin

/s/ Jeffrey M. Rosin
Counsel for IMS Fund, LLC